

sure.⁴ BellSouth, for example, has not provided the dates the “N” and “D” service orders completed for each of the 27 customers, which would help determine whether the two service order process was responsible for the loss of dial tone.

56. Not only did BellSouth fail to provide this information in its initial note but, when MCI responded to BellSouth by asking for additional information (Att. 5), BellSouth refused to provide it. BellSouth sent back a note stating that “[t]he account team’s research of the cause of the outages experienced by the 27 customers has been provided.” (Att. 6) (emphasis added). Once again this emphasizes the difficulty in working with BellSouth to obtain information needed to resolve problems.

57. In any event, at a minimum, BellSouth’s explanations seem to support the conclusion that a significant portion of the customers that have lost dial tone within 30 days of migration are losing dial tone as a result of problems associated with migration. At a minimum, the customers who lost dial tone as a result of a service order error and switch translation problems seem to fall into this category. It remains impossible to determine the exact magnitude of the problem, however.

58. The Georgia Commission states that of 17,746 UNE-P conversions for three carriers, only 45 involved a loss of dial tone. And it cites Ms. Lichtenberg’s affidavit as admitting that of 3,400 UNE-P orders MCI had submitted as of May 31, 2000 only two had lost dial tone during the conversion process. But while the Georgia Commission accurately characterizes Ms.

⁴ The two customers for whom trouble could not be found may also have lost dial tone as a result of the N and D order process but had dial tone restored before BellSouth checked the line

Lichtenberg's first affidavit in the Georgia proceeding, the subsequent affidavits she submitted as MCI gained experience showed far more instances of lost dial tone. As for the Georgia Commission's claim that of 17,746 UNE-P conversions for three carriers only 45 involved a loss of dial tone, we do not know on what this claim is based. We do know, however, that as we have previously explained, thousands of customers have lost dial tone in the 30 days after migration – even when only MCI customers are considered. This is far too high.

Missing Notifiers

59. BellSouth has managed to somewhat reduce the number of missing notifiers since we filed our prior declaration. However, that number has again begun to increase.

60. As we reported in our prior declaration, on October 19, BellSouth informed MCI that it would not again re-flow missing notifiers until November 3 – in conjunction with BellSouth's next systems release. BellSouth subsequently found, however, that it could re-flow notifiers on October 27, in conjunction with a different release of which MCI had previously been unaware. BellSouth did re-flow a substantial number of missing notifiers on October 27. BellSouth has not altered its policy, however, that it will only re-flow notifiers missing in conjunction with a release – with the exception of notifiers that are missing as a result of manual errors in the LCSC. Thus, as systems problems arise, CLECs will be forced to wait weeks or months to obtain re-flows of missing notifiers that will enable them to begin billing their customers and performing maintenance and repair for these customers.

61. In the October 27 re-flow, BellSouth was able to transmit the majority of the notifiers that had been missing as a result of defects with BellSouth's systems. BellSouth explained that most of the notifiers that were still missing after October 27 involved orders that were manually processed by the LCSC. After processing the orders, the LCSC representatives had forgotten to create the notifiers and transmit them to MCI. For this type of problem, BellSouth is able to re-flow the notifiers after MCI identifies them without waiting for the next release. Nonetheless, BellSouth has not proven able to do so quickly. The number of missing notifiers has again increased from 81 on November 2 to 111 on November 12.

62. Hopefully, the problem will not continue to grow but there is no way to know for sure. What we do know is that only substantial effort on the part of MCI in conjunction with the scrutiny attendant to a pending section 271 proceeding has led the number of missing notifiers to be reduced to present levels. And even that scrutiny has not led BellSouth to agree to adopt Interactive Agent, which would significantly help with the missing notifier and other problems. Nor has it persuaded BellSouth to begin re-flowing notifiers that are missing as a result of systems issues at times other than when a new release is implemented.

Billing

63. BellSouth has not corrected the problems that MCI has experienced with its wholesale bills. And the problems with the Daily Usage Feed ("DUF") have grown worse.

64. In our prior declaration, we reported that in the previous 90 days, BellSouth had incorrectly transmitted usage information on 7,280 intraLATA calls to MCI on the daily usage

feed. It was routing some intraLATA toll calls through its local switches rather than through the switches of the intraLATA carrier. Thus, the intraLATA carrier (often MCI) was not receiving the revenue for these calls and BellSouth was charging MCI to transmit the records for these calls on the DUF.

65. This problem has grown worse. In the past 90 days, BellSouth has erroneously transmitted 28,750 intraLATA call records in the DUF (records for more than 3,000 customers). MCI is not receiving the intraLATA revenue for these calls and is forced to pay to receive information on these calls as part of the DUF.

66. BellSouth still is doing little or nothing to correct the problem. On October 15, BellSouth transmitted an e-mail on the problem that was extremely unclear as to what BellSouth believed the cause of the problem to be. After a phone call to discuss the problem, BellSouth stated that its Network Department would investigate the problem further. Since then, MCI has not received any additional information on the problem or possible fixes – again demonstrating the paucity of support provided by BellSouth. Without such information, MCI is extremely concerned that this growing problem will become severe.

Change Management and Adequate Test Environment

67. No progress has been made in improving the change management process or test environment since we submitted our prior declaration. To the contrary, as we discussed above, BellSouth's debacle in implementing migration by telephone number further demonstrates the

flaws with that process – perhaps the most important flaw of all that exist with BellSouth’s OSS (along with BellSouth’s general failure to assist CLECs in addressing their problems).

68. BellSouth does not prioritize and implement CLEC requested changes. BellSouth does not provide proper notice and documentation for changes that do occur. BellSouth’s change management team is divorced from its IT group. And, as a result, defective interfaces are implemented and there are far too many Type 6 – systems defect – changes that need to be made. Indeed, as BellSouth itself pointed out in the October 24 change management meeting, in 2000 and 2001, it has implemented 117 Type 6 changes to address defects that have arisen in production – almost four times as many as the number of change requests it has implemented to add functionality requested by CLECs. Moreover, as we previously explained at length, important change requests to add new functionality are delayed for years or never implemented.

69. We also previously discussed the impact of BellSouth’s failure to include changes it considered were not CLEC-impacting in the change management process – a flaw exemplified by BellSouth’s attempted implementation of migrate by TN. Another example we provided in our declaration was of BellSouth’s planned implementation of a new billing system – the Tapestry system. In Florida, the Florida Commission and KPMG have decided to include BellSouth’s new Tapestry billing system in the third-party test. They were not convinced by BellSouth’s arguments that this system would not be CLEC-impacting – the same arguments BellSouth made as a basis for excluding the Tapestry system from change management and failing to provide CLECs detailed documentation on the change.

70. The Georgia Commission states that the change control process is effective. Ga. PSC Report at 127. But it does not address the fact that the process rarely leads to prioritization and implementation of important changes. Nor does it address the other important problems with the process that we previously documented. The Department of Justice correctly concluded that the change management process must improve and an adequate test environment be implemented.

Regionality

71. Our suspicions that BellSouth's OSS is not entirely regional in nature have been confirmed in recent weeks. In our initial declaration, we explained that some of the addresses that MCI pulls from BellSouth's RSAG database include an asterisk and that MCI removes that asterisk before transmitting its orders. BellSouth initially claimed that some of the address rejects MCI was receiving were the result of its removal of this asterisk. (Att. 7, letter from Pamela Reynolds, October 4, 2001.) We have now been able to show BellSouth that orders we have placed without the asterisk have proceeded through its systems without being rejected. BellSouth has acknowledged that removal of the asterisk will not cause MCI's orders to reject -- another reversal of position by BellSouth.

72. Importantly, however, BellSouth's account team stated that orders without an asterisk would only flow through without being rejected in the former Southern Bell states -- including Georgia. (Att. 8, MCI/BellSouth Action Registry Call Meeting Minutes, Nov. 1, 2001.) In the former South Central Bell states including Louisiana, BellSouth explained at a weekly meeting on November 1 that removal of the asterisk from the addresses would cause MCI's orders to reject.

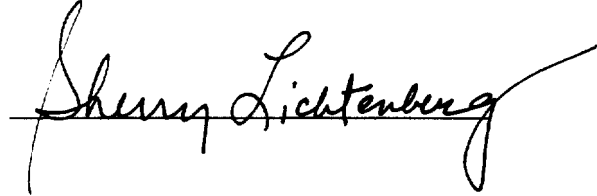
73. We do not know if orders in which the asterisk has been removed would in fact reject in the former South Central Bell states, but we do know that BellSouth's indication that they would demonstrates that its general statements in regulatory proceedings of the sameness of its OSS are incorrect or at least vastly oversimplified. Indeed, the reason BellSouth provided for why asterisks could not be removed in the South Central Bell states was that the OSS was "different" in these states. Thus, the Commission should not simply accept BellSouth's claim that its OSS is entirely regional in nature. BellSouth's – unsuccessful – Georgia experience cannot be the basis for concluding its OSS is ready in Louisiana.

Conclusion

74. This concludes our declaration on behalf of WorldCom, Inc.

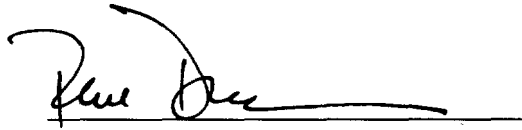
I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2001.

A handwritten signature in black ink, reading "Sherry Lichtenberg". The signature is written in a cursive style with a horizontal line underneath the name.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2001.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 13, 2001.

A handwritten signature in cursive script, reading "Karen A. Kinard", is written over a horizontal line.

☐

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2001.

Richard Cabe

ATTACHMENT 1

October 25, 2001**Release 10.2 User Requirements Review**
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Release 10.2 User Requirements Review	Cheryl Storey – Change Management Team	10/29/01

Participants/Attendees

PARTICIPANT	COMPANY
Cheryl Storey	BST - CCP
Valerie Cottingham	BST – CCP
Kim Gillette-Hoskins	Quintessent
John Estep	WorldCom
Amanda Hill	WorldCom
Bill Grant	Telcordia
Rich Robertson	WorldCom
Claudia Wickersham	Network Telephone
Peggy Rehm	Nightfire
Rita Andei	WorldCom

PARTICIPANT	COMPANY
Jane Scott	BST
Fred Brigham	WorldCom
Lorraine Watson	WorldCom
Jean Tyler	BST
Tyra Hush	WorldCom
Karen Schaffner	WorldCom
Tami Swenson	Accenture
Shamone Stapler	ITC/Deltacom
Mary Conquest	ITC/Deltacom

Meeting Information History

DATE	START TIME	END TIME
10/25/01	2:00 PM EDT	3:00 PM EDT
Conf Bridge		

MEETING PURPOSE

- **Review User Requirements for Release 10.2 – Validation of TN vs Address (REQTYP M-UNE-P)**
- **Review Action Items & Assign Owners**

October 25, 2001**Release 10.2 User Requirements Review
MEETING MINUTES****MEETING MINUTES**

Agenda Items	Discussion
1. Introduction	<p>Cheryl Storey (BST-Change Management Team) opened the meeting and stated that the purpose of this meeting was to review the user requirements for Release 10.2 regarding validation of TN vs address. This feature is associated with two change requests, CR0133 (WorldCom's) and CR0371 (AT&T's).</p> <p>Cheryl also stated that only the change associated with REQ TYP M (UNE-P) would be implemented with Release 10.2 on 11-3-01. The user requirements for REQ TYP M are reflected in the ENC14115 document. BellSouth had hoped to be able to implement the remaining REQ TYPs on 11-3-01 as well, but due to the testing and time involved needed to deliver a quality product, the remainder of the REQ TYPs and applicable ACT types would be implemented in a later release. As soon as the release number and date are available for the remaining REQ TYPs, Change Management will communicate this information to the CLEC community. The remaining REQ TYPs are reflected in the 20074 user requirements document, which will be reviewed at a later date.</p> <p>The BBR-LO will be updated on 11/9/01 to reflect the change of the address fields as optional and/or conditional based on the REQ TYP M enhancement.</p> <p>CLECs expressed concern that the business rules were not available for this change. Cheryl indicated that BellSouth added this feature to Release 10.2 based on the GA PSC recommendation and was not able to follow the normal intervals for providing supporting documentation. The CLECs indicated that they still needed the business rules in advance of the release date for coding purposes. Fred Brigham (WorldCom) stated that since there was no test window with this release, CLECs have to assume BellSouth is delivering the feature correctly.</p> <p>NEW ACTION ITEM: Change Management to investigate if the business rules can be provided to the CLEC community as quickly as possible.</p>
2. Review User Requirements for Release 10.2 – TN vs Address Validation	The following User Requirements for Release 10.2 were discussed:

October 25, 2001**Release 10.2 User Requirements Review
MEETING MINUTES**

Agenda Items	Discussion
	<p><u>Validation of TN vs Address – ENC14115</u></p> <p>Jane Scott (BST) led the review of the user requirements.</p> <p><u>Highlights of review/discussion:</u></p> <ul style="list-style-type: none">• Validating an address by the end user account telephone number versus input of the end user address data.• This feature is for non-complex UNE-P.• Applicable to TCIF 9.• REQ TYP M, ACT Types C, D, S, B, W, L, Y, V, P and Q• This feature does not impact LENS.• The SASN field is changing to optional.• The EU-City, State and Zip Code fields will be changing to conditional.• Applicable to firm orders.• Rules for ACT=N remain the same.• Order will be rejected if information does not match.• Due Date Calculation will look for address information first; and if this fails, it will look for the TN to validate the address. If still cannot validate, an error message will be returned to the CLEC.• SADLO field will be conditional. If SASN is populated, additional information is needed. <p>Bill Grant (Telcordia) questioned that since the BBR-LO section 9.2.2 states that ATN or AN for REQ TYP M, if this would change? BellSouth will verify with the SME when AN would be used with REQ TYP M.</p> <p>Tyra Hush (WorldCom) asked Change Management to note that the update to the BBR-LO is dependent upon implementation. Change Management acknowledged that it would note WorldCom's statement.</p> <p>Cheryl indicated that the TAG API for Release 10.2 is TAG 7.6.3 and will be posted to the web site day of production.</p>
3. Review of Action Items	<p>ACTION ITEM: Change Management to investigate if the business rules can be provided to the CLEC community as quickly as possible.</p> <p>ACTION ITEM: BellSouth to verify with SME when AN, ATN, EATN and EAN would be used with REQ TYP M.</p>

October 25, 2001**Release 10.2 User Requirements Review
MEETING MINUTES**

Agenda Items	Discussion
	<p>ACTION ITEM: (CLOSED) Change Management to request that the Flow Through Manager provide additional detail to CR0490 – Correct format of CCON on what change is actually being made.</p> <p><i>Status:</i> Updated CR0490 provided to CLECs on 10-26-01.</p>

ATTACHMENT 2

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91082611**

Date: November 2, 2001

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECS - **REVISED** - Electronic Interface Systems Downtime –ENCORE Release 10.2 (Originally posted on September 17, 2001, and revised on October 16, 2001)

Effective November 3, 2001, BellSouth is implementing Validating (identifying) the End User Address by Telephone Number based on the valid Activity Types for Unbundled Network Element-Platform (UNE-P), Req Type M as a part of Release 10.2 via 7.6.3 Telecommunications Access Gateway (TAG) Application Verification Interface (API).

Testing during the week of October 29, 2001, has determined that Local Service Requests (LSRs) will process correctly when only one address is associated with the provided telephone number in BellSouth's Regional Street Address Guide (RSAG). Based on a review of actual orders, BellSouth estimates that approximately 70% of LSRs will fall into this category. However, when there are 2 or more addresses reflected in RSAG, the LSR will be rejected or auto clarified back to the CLEC requesting a valid address.

Effective no later than November 17, 2001, BellSouth will begin also processing LSRs when a working address as well as one or more previous (non-working) address is reflected in RSAG. Until such time, BellSouth encourages CLECs to continue populating the valid address and telephone number on LSRs to ensure the current level of flow through is maintained and to minimize rejects and clarifications.

In addition, there are few instances where a CLEC's LSR requests a telephone number in conjunction with Req Type M. In those circumstances, a full and valid address is required.

BellSouth appreciates your cooperation and assistance in ensuring quality products/services are delivered to its clients.

Please see the attached table for details of Release 10.2.

Please contact your BellSouth account team representative with any questions.

Sincerely,

Signed J. Eric McCall for Jim Brinkley

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Attachment

ENCORE Release 10.2		
IMPLEMENTATION DATE	November 3, 2001	
SYSTEM DOWNTIMES	November 3, 2001 7:00 PM EST through November 4, 2001 12:00 PM NOON EST	
ASSOCIATED DOCUMENTATION	11-09-01 BBR-LO Version 9R	
RELEASE SCOPE	CCP CR#	FEATURE
	CR0490	Correct format of CCON on UNE-P Conversion Orders
	CR0133	Migration of UNE-P Notifications
	CR0371	TN vs. Address Validation-REQTYP M only
		DEFECTS
	CR0297	REQTYP MB, EI State being required by TAG, n/a or n/e in BBR-LO
	CR0522	Mechanized LMU Defect- V and H Coordinates
	CR0523	XDSL Firm Order Defect- Inappropriate message returned on validation error for RESID

ATTACHMENT 3

MCI / BELL SOUTH
11-3 Release Errors Call
Meeting Minutes
Nov. 7, 2001

Bridge Information: V-net 475-2634 toll free 888-469-1242 pass code 4717

Meeting Attendees	Company
Rick Whisamore	MCI
Pat Woods	MCI
Sherry Lichtenberg	MCI
Mindy Chapman	MCI
Amanda Hill	MCI
Rene Desrosiers	MCI
Micki Jones	MCI
Matt Walker	MCI
Bryan Green	MCI
Frances Trahan	MCI
Doug Lacy	MCI
Joe Laszlo	BST
Linda Tate	BST
Jill Williamson	BST
Jay Agnew	BST
Kevin Maher	BST

Action Items:

- ☐ Linda will research the changes that occur at the Central Office that cause the need for due date calculation.
- ☐ Linda will research reason for reject on 18 PONs provided by Doug Lacy.
- ☐ Linda will investigate whether BST is changing submitted addresses but not informing CLECs of these changes. This was a concern since WorldCom was getting rejects on subsequent orders when the initial orders received electronic completions indicating a valid address .
- ☐ Linda will arrange an emergency meeting this Friday or Monday with CLECs and Change Control to recommend that a BellSouth initiated change request be accepted to implement "migrate by TN and SANO" during the 11-17 release.
- ☐ Carrier Management will arrange a conference call next Tuesday to address the accuracy of the Line Loss Report and logistics of sending test orders before the 11/17 release.

Issue: Reasons for rejects since 11.3

BellSouth Response

Per Linda Tate, WorldCom's Trading Partner ID associated with Suspend and Restore orders was only loaded in EDI Central and not in BellSouth's down stream systems causing a invalid Trading Partner ID problem. Since the implementation of this trading partner ID on 10/06 all orders have been manually process by the LCSC. From 10/6 to 11/3 WorldCom sent 1,209 orders, the low volume masked the problem. When 434 orders were sent on 11/3, the trading partner problem was discovered.

Mindy Chapman clarified that the problem was not an invalid Trading Partner ID but a valid ID that BellSouth had not populated in their systems.

MCI / BELL SOUTH
11-3 Release Errors Call
Meeting Minutes
Nov. 7, 2001

BellSouth further explained that the G9871 reject, a new reject since the 11/3 release, was sent because the BST systems were unable to calculate the due date because the Trading Partner ID problem did not allow communication with some down stream systems. The reject message should have addressed the trading partner ID, that error code has since been corrected. Linda's team will investigate the reason for the approximately 250 other G 9871 rejects received by WorldCom.

Linda said the Trading Partner ID problem was fixed but during the meeting received a page that another Trading Partner ID problem had been identified and fixed.

Problem - 10.2 Release Documentation stated that CLECs would not need to change their interfaces to use migrate by TN. At the 10/25 requirements meeting, Bellsouth stated that CLECs would need to change their interface to remove the address in order to migrate by TN. CLECs requested but were not given the opportunity to test in CAVE.

BellSouth's response:

Linda Tate described the functions of the release as follows: When a CLEC sends an LSR the address is used in order to get a due date and identify central office availability. If the address is valid, the due date is calculated based on whether the CO is "open". If the address is not valid, the TN is used to pull the address from RSAG. If RSAG shows multiple working or non-working addresses on file, that order would reject to the CLEC for a correct address. This will occur approximately 30% of the time.

Linda said BellSouth's IT group has not been actively involved in the Change Management Process. Since WorldCom stated that the this process defined above was different from the walk through and business rules provided, BellSouth's IT will take a more active role in order to ensure that system functionality is more accurately communicated. Linda agreed to research what changes take place in the Central Office and report findings.

11/17 Release LCSC Communications and Testing

Problem: LCSC told MCI rejects are due to the 11/3 release and can't be fixed until the 11/17 release.

BellSouth's Response

The 11/17 release will eliminate the pulling of non-working addresses. With the retrieval of only working addresses the address reject rate goes from 30% to .01%. Currently of 8 million RSAG records, only 27K have two or more working addresses. The LCSC misstated the problem and has been corrected by BellSouth's IT team. Linda Tate offered to allow MCI to send test cases before the 11-17 release; Carrier Management will coordinate this issue.

Problem: WorldCom identified examples of moves, adds, changes, and disconnects orders rejecting with correct addresses.

BellSouth Response:

BellSouth will investigate any examples sent.

Migrate by Name and TN

Linda advised WorldCom of potential problems with the migrate by TN and Name process based on a comparison of End User name and CSR listed name. A 99.7 mismatch rate was found. BellSouth reformatted the CSR listed name and improved the mismatch to 64%. Parsed CSR, coming January 5, 2002, should further improve the name match although BellSouth has an alternative solution. BellSouth will pull the AT&T CR371, reference the WorldCom CR133, and propose a TN and SANO validation process. BellSouth will try to establish an expedited meeting with the CLEC community on this Friday or Monday in order to add this process to the 11-17 release.

Additional Issues

Carrier Management advised the WorldCom team that Linda Tate was given the last four letters of outstanding issues sent to the Account team. (The Account team has not responded to any of them) The Line Loss Report is a

MCI / BELL SOUTH
11-3 Release Errors Call
Meeting Minutes
Nov. 7, 2001

major concern for WorldCom due to regulatory compliance concerns, Linda agreed to look into this issue and report on Tuesday. WorldCom further emphasized the need for a recovery process when a line loss is not sent via the NDM, that transaction is needed to obtain the date to stop billing.

Follow up IT Support

The IT team agreed to have representation on the BellSouth weekly calls. Linda Tate agreed to participate in bi-weekly IT issue review meetings: Tuesday meetings should work for Linda and Sherry's calendar. Carrier Management will facilitate these calls.

ATTACHMENT 4

Carolina

PLACE: Dobbs Building, Raleigh, North

DATE: October 31, 2001

DOCKET NO.: P-55, Sub 1022

TIME IN SESSION: 9:05 A.M. TO 12:32 P.M.

BEFORE: Chair Joanne Sanford, Presiding

IN THE MATTER OF:

Telecommunications
Service

Application of BellSouth
Inc. to Provide in-Region InterLATA
Pursuant to Section 271 of the
Telecommunications act of 1996

VOLUME 4

A P P E A R A N C E S :

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